



August 26, 2013

SENT VIA EMAIL & CERTIFIED MAIL

Jeremy Arndt
Environmental Specialist Senior
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road; Suite 1
Windsor Heights, Iowa 50324

Re: - Appeals of Title V Operating Permit No. 99-TV-004R1 (Sergeant Bluff, Iowa, plant)
and Title V Operating Permit No. 99-TV-005R1 (Eagle Grove, Iowa, plant)
- Ag Processing Inc (AGP) response to Jeremy Arndt's July 22, 2013 letter
requesting additional information

Jeremy Arndt;

In the above referenced July 22, 2013 letter, the Iowa DNR requested additional information to demonstrate the interlocking relations between baghouses and their corresponding processes, for the emission points identified in the table below. In those instances where the information is identical, AGP has grouped EPs in the same response.

Facility	EP Number	EP Description
Sergeant Bluff	EP-40	Truck Loadout
Sergeant Bluff	EP-78	Rail Loadout Aspiration
Eagle Grove	EP-1	Grain Receiving
Eagle Grove	EP-2	Grain Handling
Eagle Grove	EP-3	Grain Receiving
Eagle Grove	EP-4	Grain Handling
Eagle Grove	EP-5	Grain Receiving
Eagle Grove	EP-6	Grain Handling
Eagle Grove	EP-12	Cracking and Dehulling
Eagle Grove	EP-14	Cracking and Dehulling
Eagle Grove	EP-31	Railroad Car Bulk Loading
Eagle Grove	EP-65	Rail Meal Loadout
Eagle Grove	EP-34	Stoker Boiler #1
Eagle Grove	EP-35	Stoker Boiler #2

1. Please state specifically, for each baghouse, what operating conditions would cause AGP to shut down both the baghouse and the associated process line or a portion thereof.

AGP's response is applicable to all EPs listed in the prior table, except as indicated by additional information for specific EPs in this section.

The recovery device (baghouse) and associated process equipment/conveyors are electronically interlocked. The baghouse must first be turned on and be operating before the electronic circuitry will allow the associated equipment/conveyors to be turned on.

If for any reason, the fan on the recovery device shuts down, the associated equipment/conveyors are automatically shut down.

If the process shuts down for any reason, there is no aspiration of product and no need for product recovery. However, the product recovery devices are typically left running so that when the process is ready to begin operating, the recovery device is already running.

Sergeant Bluff: EP40 & EP78:

The recovery devices associated with these two EPs have level indicators in the recovery device that can detect if recovered product is not being adequately removed. If the rate of removal from the recovery device is significantly slower than the rate of capture, the recovery device fan will shut off, automatically resulting in the associated equipment/conveyors being shut off.

Eagle Grove: EP34 & EP35:

When an induced draft fan kicks out (which pulls air through the bag houses and out to the boiler stack), the interlock shuts down the coal feed drags and everything associated with that boiler. The induced draft fans have to be running before the boilers can be started back up.

2. For each baghouse, please provide the applicable indicator pressure drop range.

AGP's response is applicable to all EPs listed in the prior table.

AGP operates each of the baghouses within the manufacturer's suggested operational range. There are a number of variable factors (temperature, humidity, air flow rate, operational conditions, etc.) that impact the actual pressure drop across a baghouse. 'Typical' pressure drop numbers vary from baghouse to baghouse based on these factors. AGP monitors the measured pressure drop primarily to identify any unexplained changes in pressure drop.

3. For each baghouse, please provide the frequency of observation of the baghouse operations.

AGP's response is applicable to all EPs listed in the prior table.

At a minimum, AGP monitors and records the operation, pressure drop and visible emissions for each baghouse in accordance with the Agency or Facility Operation & Maintenance Plan requirements in the Title V operating permit for each facility.

Additionally, plant operators and maintenance employees are responsible for the continual proper function and operation of the baghouses.

4. For each bag house, please provide the specific procedure to shut down both the baghouse and the associated process line if the appropriate conditions exist.

(See response to #1 above.)

5. Within what period of time would shutdown of the baghouse occur?

AGP's response is applicable to all EPs listed in the prior table.

As described above in question #1, the shutdown would immediately occur.

6. Within what period of time would shutdown of the associated process equipment occur?

AGP's response is applicable to all EPs listed in the prior table.

As described above in question #1, the shutdown would immediately occur.

7. Are there written instructions regarding the procedures to occur in the event of a baghouse shutdown? If so, please provide copies.

AGP's response is applicable to all EPs listed in the prior table.

As described in response to previous questions, the shutdown of process equipment associated with the shutdown of the baghouses listed above is an 'automatic' process. Consequently, there is not a need for written instructions.

8. Are there written instructions regarding the procedures to occur in the event of an associated process equipment shutdown? If so, please provide copies.

AGP's response is applicable to all EPs listed in the prior table.

As described in response to previous questions, the shutdown of process equipment associated with the shutdown of the baghouses listed above is an 'automatic' process. Consequently, there is not a need for written instructions.

9. Is there documentation of any previous baghouse and associated process equipment shutdowns, including the date, a description of the reason for the shutdown, the amount of time the shutdown lasted, the resolution of the issue, and an estimate of product loss during the shutdown? If any of this information is available, please provide it.

AGP's response is applicable to all EPs listed in the prior table.

As described in response to previous questions, the shutdown of process equipment associated with the shutdown of the baghouses listed above is an 'automatic' process. Records are not kept regarding these shutdowns. When both the process and recovery device (baghouse) are shutdown, there is no measurable product loss.

Please contact me if any clarification of the above responses is needed.

Thank you.



Kelly P. Jorgensen
Director of Environmental Compliance
402-498-5501
kjorgensen@agp.com

c: (by email only)

Lori Hanson – IDNR

Weston Li – IDNR

Anne Preziosi – IDNR

Jeff Lampman – AGP Eagle Grove

Joe Kirby – AGP Sgt. Bluff

Jeff Dencklau – AGP Eagle Grove

Cathy King – AGP Sgt. Bluff

Allison Willis – AGP Omaha

Ernie Kiley – AGP Omaha